

[Parties and Counsel Listed on Signature Pages]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

*People of the State of California, et al. v. Meta
Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK
4:23-cv-05448-YGR

**META AND STATE AGS’
STIPULATION AND [PROPOSED]
ORDER EXTENDING CERTAIN
EXPERT AND RELATED PRETRIAL
DEADLINES**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, the State Attorneys General (“State AGs”)
2 and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms
3 Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel,
4 hereby stipulate as follows:

5 1. By stipulation of the Parties and Order of the Court (ECF 1955, 2139, and 2251), the
6 expert discovery deadlines relating to two AG-specific experts—Carl Saba, and Patrick McDaniel—
7 were extended to the dates reflected in the second column of the chart below.

8 2. The Parties have met and conferred over several weeks and agree, subject to Court
9 approval, to extend by approximately three to five weeks the deadlines for (a) Meta’s reports responsive
10 to Saba and McDaniel; (b) the rebuttal reports corresponding to these two experts; (c) the close of expert
11 discovery as related to these two experts and any related responsive and rebuttal experts; and (d) the
12 deadlines for Rule 702 motions as to these experts, as reflected in the chart below.

13 3. As part of the meet and confer process, the Parties have agreed to disclose certain
14 underlying computer code and inputs used to generate various tables and figures contained in the
15 reports.

16 a. For Saba’s report, Meta’s reports responsive to Saba, and rebuttal reports
17 corresponding to Saba, the Parties shall produce underlying spreadsheets and models used to
18 calculate the figures and generate the tables contained in the respective reports.

19 b. For McDaniel’s report, Meta’s reports responsive to McDaniel, and rebuttal
20 reports corresponding to McDaniel, the Parties shall produce the query code used to generate any
21 tables or figures in the reports, as well as a description of the analysis methodology, including
22 the bates numbered data files used, the order of operations used in the analysis, and the data
23 management techniques used.

24 c. For Meta responsive reports to Saba and McDaniel, and Plaintiff rebuttal reports
25 corresponding to Meta’s responsive expert reports, the parties agree to produce the underlying
26 materials identified in 3a and 3b on the date of the report submission.

4. The Parties have agreed that these disclosures and deadline extensions resolve any dispute regarding the sufficiency or timing of disclosure of code, analysis methodology, or underlying inputs for the Saba and McDaniel reports.

5. Also, as part of the meet and confer process, the Parties have agreed the changes in these deadlines will not affect other deadlines in the case schedule, including existing deadlines for Summary Judgment and other 702 motions.

6. This Court has previously extended expert and Rule 702 motion deadlines, on agreement of all parties to the MDL as part of an MDL-wide schedule extension, *see* ECF 1159, and again as to four State AG-specific experts, including the two experts involved in this extension, on agreement of the State AGs and Meta, *see* ECF 1955, with later, further agreed-upon extensions of expert report deadlines, *see* ECF 2139 and 2251.

7. Therefore, the Parties agree, subject to the Court's approval, that the following deadlines will apply:

Event	Current Deadline	Proposed Deadline
Non-Case Specific and Causation Experts: Defendants' Responsive Reports	December 19, 2025 (for Meta's responsive reports to the McDaniel and Saba reports), <i>or approximately 4 weeks after Opening Reports</i>	January 9, 2026 (for Meta's responsive reports to the McDaniel and Saba reports)
Non-Case Specific and Causation Experts: Plaintiffs' Rebuttal Reports	January 16, 2026 (for the State AGs' rebuttal reports in response to Meta's responsive reports to the McDaniel report), <i>or approximately 4 weeks after Responsive Reports</i> January 23, 2026 (for the State AGs' rebuttal reports in response to Meta's responsive reports to the Saba report), <i>or approximately 5 weeks after Responsive Reports</i>	February 13, 2026 (for the State AGs' rebuttal reports in response to Meta's responsive reports to the McDaniel report) February 20, 2026 (for the State AGs' rebuttal reports in response to Meta's responsive reports to the Saba report)
Close of Expert Discovery	January 30, 2026 (for depositions of McDaniel, Saba, Meta's responsive experts, and any AG rebuttal experts), <i>or</i>	March 6, 2026 (for depositions of McDaniel, Saba, Meta's responsive experts, and any AG rebuttal experts)

Event	Current Deadline	Proposed Deadline
	<i>approximately 1 to 2 weeks after Rebuttal Reports</i>	
Rule 702 (Daubert) Motions: Letter Briefs	<p>January 5, 2026 (for affirmative letter briefs (one brief total per side) as to Meta's and the State AGs' Rule 702 motions as to Patrick McDaniel and Carl Saba, Meta's responsive experts to McDaniel and Saba, and any AG rebuttal experts as to those responsive experts)</p> <p>January 12, 2026 (for any responses to affirmative letter briefs (one brief total per side) as to Meta's and the State AGs' Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts)</p>	<p>January 23, 2026 (for affirmative letter briefs (one brief total per side) as to Meta's and the State AGs' Rule 702 motions as to Patrick McDaniel and Carl Saba, Meta's responsive experts to McDaniel and Saba, and any AG rebuttal experts as to those responsive experts)</p> <p>January 30, 2026 (for any responses to affirmative letter briefs (one brief total per side) as to Meta's and the State AGs' Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts)</p>
Rule 702 (Daubert) Motions: Opening Briefs	February 13, 2026 (for Meta's and the State AGs' Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts), <i>or 2 weeks after the Close of Expert Discovery as to McDaniel and Saba</i>	March 13, 2026 (for Meta's and the State AGs' Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts)
Rule 702 (Daubert) Motions: Opposition Briefs	March 6, 2026 (for Meta's and the State AGs' Rule 702 oppositions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts), <i>or 3 weeks after Opening Briefs as to McDaniel and Saba</i>	April 3, 2026 (for Meta's and the State AGs' Rule 702 oppositions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts)
Rule 702 (Daubert) Motions: Reply Briefs	March 27, 2026 (for Meta's and the State AGs' replies in support of Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts), <i>or 3 weeks after Opposition Briefs as to McDaniel and Saba</i>	April 24, 2026 (for Meta's and the State AGs' replies in support of Rule 702 motions as to McDaniel and Saba, Meta's responsive experts, and any AG rebuttal experts)

IT IS SO STIPULATED AND AGREED.

Respectfully submitted,

DATED: December 16, 2025

By: /s/ Megan O'Neill

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SIGNATURE CERTIFICATION

Under Civ. L.R. 5-1(h)(3), I, Krista Batchelder, hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: December 16, 2025

/s/ Krista Batchelder

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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3
4 DATED:

5 YVONNE GONZALEZ ROGERS
6 UNITED STATES DISTRICT JUDGE
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